

Marquis Aurbach
Nick D. Crosby, Esq.
Nevada Bar No. 8996
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
ncrosby@maclaw.com
Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ANDREW PALMER KLEIN,

Plaintiff,

Case Number:
2:25-cv-00100-RFB-MDC

vs.

VIMWORLD, INC., a Delaware corporation;
CREAM, LLC, a Nevada limited liability
company,

Defendants.

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
TO FILE RESPONSE TO COMPLAINT
(FIRST REQUEST)**

It is hereby stipulated between Plaintiff Andrew Palmer Klein ("Plaintiff"), by and through his attorney of record, Greenberg Gross LLP and Defendants Vimworld, Inc. and Cream, LLC (collectively "Defendants"), by and through their attorney of record, Marquis Aurbach, that the deadline for Defendants to file their response to Plaintiff's Complaint be extended from May 5, 2025 to May 19, 2025.

1. Plaintiff filed his Complaint on January 15, 2025.
2. A Waiver of Service of Summons was executed by the parties on March 5, 2025, making the Defendants' responsive pleading due May 5, 2025.
3. Counsel for Defendants starts a United States District Court trial on May 5, 2025 through May 12, 2025 in *Lechner v. LVMPD, et al.*, Case No. 2:19-cv-00638-RFB-MDC and also has a Ninth Circuit oral argument hearing in *Solomon v. LVMPD, et al.*, Case No. 23-4166 on May 14, 2025 in Phoenix AZ.
4. After consulting with Plaintiff's counsel, the parties have agreed to extend the deadline for Defendants to file their response from May 5, 2025 to May 19, 2025.

5. This extension is not an intent to further delay.

IT IS SO STIPULATED this 29th day of April, 2025.

MARQUIS AURBACH

GREENBERG GROSS LLP

By: s/Nick D. Crosby
Nick D. Crosby, Esq.
Nevada Bar No. 8996
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorney for Defendants

By: s/Michael A. Burnette
Michael A. Burnette, Esq.
Nevada Bar No. 16210
1980 Festival Plaza Dr., Ste. 730
Las Vegas, Nevada 89135
Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED the deadline for Defendants to file their response is extended from May 5, 2025 to May 19, 2025.



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Date: 4/30/2025

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816